

B'H

Ari B. Teman

Mon, 14 April 2023
23rd of Nisan, 5783

The Honorable Paul Engelmayer
District Judge
Southern District of New York
40 Foley Square,
New York, NY

Re: Motion to Unseal the copy of the Motion to Compel Discovery filed in the 11th Circuit & Update on Travel to Israel being allowed by Judge Nunez

Your Honor,

The defendant respectfully requests that the motion to Compel Discovery filed to the Eleventh Circuit be unsealed and docketed in the entirety, so as to give a more fair and full picture of the events. The motion cites transcript of Body Worn Camera footage of the police making comments about “the Jewish community”, pressuring witnesses to change their position to press charges to avoid having Teman press charges when he is out of the hospital, and then feeding witnesses statements verbatim. The transcripts document the witnesses admitting, among other things, that they threw chairs, body slammed Teman, etc.

For example, the following transcript segments speak volumes about the credibility of those accusing Mr. Teman:

12:09 MBPD OFFICER RODRIGUES: You made it an issue today

12:15: RODRIGUES: But the law isn't fair and you know...

12:20 WITNESS KATS: **I just don't want to be put into a position where I'm going to be charged with something**

RODRIGUES: I know. But unfortunately, and I mean, we're talking on camera, but you know, it's like... I don't think it will turn into... I mean I'm hoping right

KATS: Me either. But I'm afraid he's [Teman] going to find something.

RODRIGUES: But he [Teman] won't speak to us.... And that community...the Jewish community. They have their own.

[The BWC clip is suddenly and abruptly ended without any explanation.]

As well:

KATS: I charged him [Teman] and they [Kats' necklaces] broke

...

MBPD OFFICER RODRIGUES (13:03): It would help if she wanted to press charges. You know what I'm saying?

KATS: We'll see what's going to happen

KATS: Isa, do you want to press charges?

SIBLESZ: It will help you? [Siblesz pointing to Katz (13:16)]

2nd MALE CROSSFITTER: Because he's [Teman is] going to.

KATS: If something rolls around, you know...

2nd Male CrossFitter (to Pasquale the Caffe Umbria Owner): "You're the owner, you know our position... but we have to protect him (pointing to Kats) because you know.

Cafe Owner: Yeah, yeah, yeah, no, no, no.

2nd Male CrossFitter: "That's a lot of people not coming to the coffee shop anymore."

MBPD OFFICER REISGO: It doesn't show him [Ari] pushing... but the story... as long as the story is consistent

There are many such quotes, rather shocking statements by the Miami Beach Police Officers and their witnesses -- including that they are longtime friends and fellow CrossFitters.

To leave on the docket the fact of an arrest and hide the discriminatory statements by the police and their encouraging the witnesses to change their positions, after they said they were not injured and did not want to press charges, would be to present an unfair and biased view to the public.

As this motion to compel discovery is already a public document in the Eleventh Circuit, it should also be public in this court.

A brief update on the bond conditions in FL

For Your Honor and Mr. Bhatia's convenience, and to save both the Government and Your Honor's time, the Defendant respectfully notes that today, at an 11:14am hearing, Judge Nunez modified bond conditions to allow travel to Israel between April 17 and May 9, and to NY and NJ for court at any time. The city already stipulated-to and the judge ordered a "no jail" stipulation.

The Defendant has also filed a Federal Civil Rights suit against the city and county (1:23-cv-21361) and intends to amend the complaint based on the revelations of religiously-motivated discrimination heard on the BWC footage. The defendant is confident of victory in the Miami Beach matters, and in the matter before the Second Circuit.

Additional incentives for the Defendant to Return to the USA

Furthermore, as Your Honor may be aware, in this very district, the Defendant's company won a nice victory against, Amazon, defeating them on 7 counts in their motion to dismiss, and allowing our claims against them to proceed (

<https://news.bloomberglaw.com/esg/amazon-to-face-claims-it-tampers-with-apartment-intercom-devices>).

We are confident of victory in this and all legal matters. The Defendant will return to the USA and collect what is owed to him.

The defendant therefore respectfully requests that Your Honor join Judge Nunez in allowing him to travel to Israel between April 14 and 17.

Respectfully requesting Mr. Bhatia refrain from sociopathic attacks on parents who are sad over a child's death and other similar tactics

The Defendant also asks that Mr. Bhatia refrain from tactics he has used in the past, such as attacking me for being distraught over a lost child.

For no good reason whatsoever, because this is not white collar case and the Court and Government have conceded that I am not a flight risk, the Court and Mr. Bhatia held me in near solitary confinement for 20 hours a day for 19 months and it caused severe mental harm and physical health conditions. I have not seen my parents for years, and I was separated from my girlfriend and the mother of my child for nearly two years. Over a billing dispute where the clients admit they read the terms but two years later suddenly claim they chose to not read the Payment Terms subpage! (Which we know they were lying from Ms. Shelly Pecot's letter and evidence she provided Your Honor in Dkt. 274 after sentencing). For this I was kept in a box for most of two years?

There is no reason to continue to prevent me from being with loved ones.

Please, Your Honor, there is nothing Mr. Bhatia is going to say that warrants what has already been done to me, let alone making it worse. Please let me see my mother without further delays.

Mr. Williams and Mr. Bhatia, this is an opportunity for you to file a simple, one-sentence letter which says, "The Government does not object to Mr. Teman visiting his mother in Israel between April 17 and May 10, 2023, provided he remains in contact with Pretrial Services and follows their instructions, and wishes his mother a speedy recovery and good health."

Thank you,

A handwritten signature consisting of a stylized, flowing line that starts with a large loop on the left and tapers off towards the right.

Ari Teman
Defendant,
Pro Se (not by choice)